

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

)
JANE DOE NO. 1, JANE DOE NO. 2, and)
JANE DOE NO. 3,)
Plaintiffs,)
v.) Docket No. 1:17-cv-11069-LTS
BACKPAGE.COM, LLC, CARL FERRER,)
MICHAEL LACEY, and JAMES LARKIN,)
Defendants.)
)

**PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO
CONTINUE THE SCHEDULING CONFERENCE**

Plaintiffs Jane Doe No. 1, Jane Doe No. 2, and Jane Doe No. 3 (“Plaintiffs”) respectfully submit this Opposition to Defendants’ Motion to Continue the Scheduling Conference filed on May 1, 2018. Defendants seek a 30-day continuance of the May 7, 2018 scheduling conference per the Court’s Notice of Scheduling Conference entered on March 29, 2018 (Doc. No. 55).

Though the circumstances may justify an extension of Defendants’ time to answer the Amended Complaint, Plaintiffs submit that the Scheduling Conference should occur on May 7, 2018. First, Plaintiffs have complied with each obligation under Local Rule 16.1 and the terms of Fed. R. Civ. P. 16, and an extension would reward Defendants’ failure to do so. Indeed, Defendants thus far have failed to communicate with Plaintiffs’ counsel in any way regarding the interim steps contemplated by Local Rule 16.1 and Federal Rule 16, nor does their motion offer any excuse for their conduct. Whatever difficulties the recent circumstances may present, the failure to communicate with Plaintiffs’ counsel or with the Court until now is not acceptable conduct. Moreover, Defendants’ motion makes no reference to the role of Prince Lobel Tye

which apparently continues to represent all defendants. Second, and more importantly, the apparent internal maneuvering among Defendants and their counsel is a matter of considerable concern, and the Plaintiffs are entitled to reasonable assurance that the efficient resolution of this matter will not be compromised as a result. The involvement of the Court, and the imposition of a reasonable schedule, would assist in achieving that goal.

Therefore, Plaintiffs respectfully request that the Court deny Defendants' Motion to Continue the Scheduling Conference.

Dated: May 1, 2018

FOR JANE DOE NO. 1, JANE DOE NO. 2,
and JANE DOE NO. 3

/s/ John T. Montgomery

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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of May, 2018, this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: May 1, 2018

/s/ John T. Montgomery

John T. Montgomery